

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

BRENNAN M. GILMORE,

Plaintiff,

v.

ALEXANDER E. (ALEX) JONES; *et al.*,

Defendants.

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Civil Action No. 3:18-cv-00017NKM-JCH

**MOTION FOR EXTENSION OF TIME
FOR DEFENDANTS ALEXANDER E. JONES, INFOWARS LLC, AND FREE SPEECH
SYSTEMS, LLC
TO RESPOND TO SECOND SET OF DISCOVERY REQUESTS**

Defendants Alex Jones, Infowars, LLC (“Infowars”), and Free Speech Systems, LLC (“FSS”) (collectively, “Moving Defendants”), by and through counsel, respectfully move this Court for a short extension of time to respond to Plaintiff’s Second Set of Interrogatories and Second Set of Requests for Production of Documents.

Moving Defendants request that this Court extend the deadline for response to the aforementioned discovery from February 14, 2021 to March 17, 2021.

Moving Defendants are diligently working to comply, but require an extension due to the voluminous nature of the documents that are required to be reviewed and produced. The parties have met and conferred in an attempt to narrow some of the search terms to relieve some of the burden, but it still has proven burdensome. For example, Plaintiff insists on the word “state” being among the search terms. However, this word resulted in 177,129 search hits. Even the narrower term “deep state” resulted in 35,663 search hits.¹

¹ The search term “Department of State” resulted in a more manageable 1,776 search hits.

Plaintiff will not be prejudiced from this short extension and this motion is being filed in good faith and not for the purpose of delay. The Court entered a similar extension order for three other defendants, extending their deadlines to March 17, 2021. (ECF No. 241).

Defendants Jones, Infowars, and FFS respectfully move this Court to modify the discovery deadline from February 14, 2021, to March 17, 2021.

Dated: March 9, 2021

Respectfully submitted,

/s/ Evan D. Mayo

Evan D. Mayo (VSB No. 89383)
Thomas E. Albro (VSB No. 12812)
Tremblay & Smith, PLLC
105-109 East High Street
Charlottesville, Virginia 22902
Tel: 434-977-4455
Fax: 434-979-1221
evan.mayo@tremblaysmith.com

Marc J. Randazza, *pro hac vice*
RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Suite 109
Las Vegas, Nevada 89117
Tel: 702-420-2001
Fax: 305-437-7662
ecf@randazza.com

*Attorney for Defendants Alexander E. Jones,
Infowars, LLC, and Free Speech Systems, LLC*

CERTIFICATE OF SERVICE

I hereby certify that, on this 9th day of March 2021, a copy of the foregoing was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Evan D. Mayo
Evan D. Mayo (VSB No. 89383)
Tremblay & Smith, PLLC
105-109 East High Street
Charlottesville, Virginia 22902
Tel: 434-977-4455
Fax: 434-979-1221
evan.mayo@tremblaysmith.com